Subject: Re: [External] Public Records Request — ALPR Vendor Licensing (Flock Group, Inc. and others) — N.C. Gen. Stat. Ch. 132
Date: Friday, August 28, 2026 at 1:50:34 PM Eastern Daylight Time
From: Sherwin, Paul
To: Mark Williams
Attachments: Outlook-A picture .jpg, Outlook-cidimage00.jpg, Outlook-A picture .gif, Outlook-cidimage00.gif, Flock Safety Registration Roster 8.28.26.csv, LPR complaint 11.11.23 - withdrawn.pdf, Flock Moreno License Application - Redacted.pdf

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Mark,

Thanks for the follow-up. I'm the only person in my office who works on public records requests, so large ones like yours can take a while. I reviewed your original July 15 request, your narrowed July 16 request, and my response and documents I provided on July 17, and here's where I think we are based on your original request.

A) I've given you what we have, except for the registration files of the 19 employees Flock Safety has registered under its license. These files require extensive redaction to protect sensitive personally identifiable information. Will the attached registered employee roster suffice? Rather than providing the complete application file for each employee?
B) All documents provided on July 17.
C) Most documents provided July 17. The emails in (9) are 114 MB and too large to email. I can put them on a flash drive and you can pick it up, or you can arrange for me to "drop" them in a file share system if you have one. You can find (10) online here: https://www.ncdps.gov/about-dps/boards-and-commissions/alarm-systems-licensing-board/meetings-minutes
D) We don't have these records. Use of 3rd-party installers isn't something we track.
E) Answered on July 17.
F) See below for specifics. I also attached a complaint we received in 2023 that named a few of the companies. We did not investigate the complaint, due to a lack of specifics and not having a named complainant.
   a. Rekor, not licensed, no records on file, no complaints
   b. Verkada, licensed under Dennis Pieta, #625479-CSA, expires 11/30/2027, no complaints
   c. Motorola, licensed under Robert Tebault, #721547-CAS, expires 7/31/2028, no complaints
   d. Leonardo, not licensed, no records on file, no complaints
   e. Plate Ranger, not licensed, no records on file, no complaints
   f. Axon, not licensed, no records on file, no complaints

The Board does not track which companies provide what kind of services (traditional security, ALPR, etc.) But, reportedly, Hodges Triad Electric was conducting contract work for Flock in 2023. I have no record or memory of what we learned about that.

Thanks, and please let me know if you have additional questions.

Paul Sherwin
Director
NCDPS Private Protective Services
Security Systems Licensing Board
Private Protective Services Board

Main Office: 919-788-5320
Direct: 984-220-8625
Cell: 919-218-1549
E-mail: paul.sherwin@ncdps.gov

3101 Industrial Dr, Suite 104
Raleigh, NC 27609

From: Mark Williams <mwilliams@ricefamilylaw.com>
Sent: Thursday, August 27, 2026 10:52 PM
To: Sherwin, Paul <paul.sherwin@ncdps.gov>
Subject: Re: [External] Public Records Request — ALPR Vendor Licensing (Flock Group, Inc. and others) — N.C. Gen. Stat. Ch. 132

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Would you please update me on the status of the production?

Thank you,

~Mark

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Mark Spencer Williams
Attorney

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From: Sherwin, Paul <paul.sherwin@ncdps.gov>
Date: Friday, July 17, 2026 at 10:54 AM
To: Mark Williams <mwilliams@ricefamilylaw.com>
Subject: Re: [External] Public Records Request — ALPR Vendor Licensing (Flock Group, Inc. and others) — N.C. Gen. Stat. Ch. 132

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Mark,

Sure, I can provide records on a rolling basis.

For starters, I've attached the two complaints from 2022 that initiated the Board's push to require Flock to be licensed. I've also attached Ralph Taylor's initial 2024 license application and 2026 renewal application. Taylor holds the SSLB license for Flock Safety. I think most of what you asked for is included in these four documents. I'll review your original request in the near future to determine what else you've asked for that will require additional document research.

1. Flock's current license or registration (Item A.1) — license number, class, issue date, expiration date, and current licensee record.

License number: 367626-CSA (Ralph Taylor)
Class: Alarm
Issue date: July 23, 2024
Expiration date: August 31, 2026
Current licensee record: I've attached Taylor's 2024 application for a new license.

2. Flock's renewal application for the license expiring July 31, 2026, all correspondence concerning that renewal, and records sufficient to show the renewal's current status (Item A.3).

Taylor submitted a renewal application on July 15, 2026. Board staff reviewed it on July 16 and asked Taylor to submit a corrected certificate of insurance and continuing education certificates. Taylor has 60 days to make the corrections, and the license remains valid during that time. The application is attached.

3. Any determination, interpretation, or legal opinion addressing whether automated license plate readers fall within the Board's jurisdiction under N.C. Gen. Stat. Chapter 74D (Item E).

Automated license plate readers that are used for the purpose of detecting or observing burglary, breaking or entering, intrusion, shoplifting, pilferage, theft, or other unauthorized or illegal activity fall under the Board's jurisdiction. Flock's cameras undoubtedly fall into this definition, which is why the Board required the company to get a Security Systems license.

Paul Sherwin
Director
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From: Mark Williams <mwilliams@ricefamilylaw.com>
Sent: Thursday, July 16, 2026 10:32 AM
To: Sherwin, Paul <paul.sherwin@ncdps.gov>
Subject: Re: [External] Public Records Request — ALPR Vendor Licensing (Flock Group, Inc. and others) — N.C. Gen. Stat. Ch. 132

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Mr. Sherwin,

Thank you for acknowledging receipt. I write to request that the Board produce records on a rolling basis as they are located and reviewed, rather than holding production until the full request is complete.

One item within this request carries immediate public significance. Flock Group, Inc. holds a license expiring July 31, 2026 — less than three weeks from today. The renewal application and all correspondence concerning its current status (Item A.3 of the request) directly bear on whether Flock will be authorized to continue operating in North Carolina after that date. This is not an abstract compliance matter. Flock cameras are currently deployed across multiple North Carolina jurisdictions, and the question of whether this vendor is licensed, and under what conditions, is a matter of active public concern over the use of automated license plate reader technology for mass vehicle surveillance on public roads.

Accordingly, I ask that the Board prioritize and produce the following items immediately, or as soon as they are located:

1. Flock's current license or registration (Item A.1) — license number, class, issue date, expiration date, and current licensee record.
2. Flock's renewal application for the license expiring July 31, 2026, all correspondence concerning that renewal, and records sufficient to show the renewal's current status (Item A.3).
3. Any determination, interpretation, or legal opinion addressing whether automated license plate readers fall within the Board's jurisdiction under N.C. Gen. Stat. Chapter 74D (Item E).

The remaining items — the 2022 investigation and litigation records, compliance history, third-party installer records, and records for other ALPR vendors — may follow in the ordinary course. I am not asking the Board to compress the full production. I am asking only that the records bearing on an expiring license be separated from the broader request and produced as soon as practicable.

If the renewal file is already assembled or the license status is readily confirmed, production of those records could be immediate. If any portion is subject to a claimed exemption, please produce the non-exempt portions now and identify the statutory basis for any withholding, so that issue can be addressed without further delay.

With all best wishes,

Mark

Sent from my mobile device often with speech to text. Please forgive any typos.

Mark Spencer Williams
Managing Attorney
NCDRC Certified Mediator – Superior Court & Family Financial
Certified Parent Coordinator

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From: Sherwin, Paul <paul.sherwin@ncdps.gov>

Sent: Thursday, 16 July 2026 16:12:47
To: Mark Williams <mwilliams@ricefamilylaw.com>
Subject: Re: [External] Public Records Request — ALPR Vendor Licensing (Flock Group, Inc. and others) — N.C. Gen. Stat. Ch. 132

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Mark,

Received, thanks.

I strive to return public records requests within 30 days, but this one may take longer given the broad scope.

Paul Sherwin
Director
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Private Protective Services Board

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From: Mark Williams <mwilliams@ricefamilylaw.com>
Sent: Wednesday, July 15, 2026 11:10 AM
To: SVC_DPS.PPSASL <PPSASL@ncdps.gov>
Cc: Sherwin, Paul <paul.sherwin@ncdps.gov>
Subject: [External] Public Records Request — ALPR Vendor Licensing (Flock Group, Inc. and others) — N.C. Gen. Stat. Ch. 132

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To the Custodian of Public Records, Security Systems Licensing Board:
Pursuant to the North Carolina Public Records Act, N.C. Gen. Stat. Chapter 132, I request to inspect and obtain copies of the following records held by the Board and by the Department of Public Safety. Where a record exists in electronic form, please produce it electronically (PDF, or native CSV/Excel for any data export).

A. Flock Group, Inc. — licensing file

1. The current license or registration held by **Flock Group, Inc.** (also doing business as **Flock Safety**), including the license number, class, issue date, and expiration date, and the licensee record as maintained by the Board.
2. All applications submitted by Flock Group, Inc. for licensure or registration, with supporting materials.
3. Any **renewal application** for the license expiring **July 31, 2026**, together with all correspondence concerning that renewal, and records sufficient to show the renewal's current status.

B. The 2022 investigation and the resulting litigation

4. The investigative file arising from the Board's investigation, opened in or about **January 2022**, into whether Flock was operating in North Carolina without a license — including the complaint or referral that initiated it, investigative reports, findings, and disposition.
5. All records concerning the Board's action in **Wake County Superior Court**, including the Board's filings, any consent order or settlement, and the **October 2023 order** requiring Flock to cease installing systems in North Carolina except through a licensed third party.
6. All records concerning Flock's agreement, in or about **March 2024**, to submit a license application by June 1, 2024, and the Board's evaluation of that application.

C. Compliance history

7. All **complaints** received by the Board concerning Flock Group, Inc. or Flock Safety since **January 1, 2020**, and the disposition of each.
8. Any notice of violation, cease-and-desist, civil penalty, consent agreement, probation, suspension, revocation, or other disciplinary or enforcement action involving Flock.
9. All correspondence between the Board or DPS staff and Flock, its counsel, or its agents, since **January 1, 2020**.
10. Board agendas and minutes referencing Flock since **January 1, 2020**.

D. Third-party installers

11. Records identifying the **licensed persons or entities that have installed Flock systems in North Carolina**, including any list, notice, or report submitted to the Board identifying installers, and any records showing which North Carolina installations were performed by which licensee.

E. The threshold legal question

12. Any **determination, declaratory ruling, staff interpretation, guidance, or legal opinion** — formal or informal — addressing whether an automated license plate reader constitutes an "alarm system" or otherwise falls within the Board's jurisdiction under N.C. Gen. Stat. Chapter 74D and 14B NCAC Chapter 17. This includes any position Flock advanced to the contrary and the Board's response to it.

F. Other ALPR vendors

13. For each of the following, records sufficient to show **whether the entity holds or has ever held a license or registration from the Board**, the status and expiration of any such license, and any complaints, investigations, or enforcement actions concerning it:

a. **Rekor Recognition Systems, Inc.** / Rekor Systems (products including "Rekor Scout")
b. **Verkada Inc.**
c. **Motorola Solutions, Inc.** / Vigilant Solutions
d. **Leonardo** / ELSAG North America
e. **Plate Ranger**
f. **Axon Enterprise, Inc.** / Fusus

14. Any list the Board maintains of licensees whose licensed activity includes license plate recognition, automated license plate readers, or vehicle-recognition systems.

If the Board takes the position that any of these vendors falls outside its jurisdiction, a brief written statement to that effect will satisfy the corresponding portion of item 13, and I would appreciate that confirmation.

I am willing to pay reasonable duplication costs. If you anticipate any fee, including any special service charge under **N.C. Gen. Stat. § 132-6.2(b)**, please notify me with an estimate before incurring it. If you contend any portion of these records is exempt or confidential, please produce all reasonably segregable non-exempt portions and **cite the specific statutory basis** for each withholding or redaction. If no records exist responsive to a numbered item, a written statement to that effect will satisfy it.
Please acknowledge receipt and provide an estimated timeframe for production.
Sincerely,
Mark Spencer Williams
Managing Attorney, Rice Law PLLC
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